

ORIGINAL

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION

JAMES EDWARD BROGDON, JR., *as Executor of the Estates of Debra Mills and Herman Mills*, JAMES EDWARD BROGDON, JR. and RONALD BRIAN BROGDON, *individually and as surviving children of Debra Mills*, and JASON EDWIN MILLS, *individually and as surviving child of Herman Mills*,

Plaintiffs,

vs.

CASE NO. 4:23-CV-88

FORD MOTOR COMPANY,

Defendant.  
\_\_\_\_\_  
/VERDICT AND WRITTEN QUESTIONS TO THE JURY

## I. CLAIMS ON BEHALF OF DEBRA MILLS

A. Debra Mills Estate Claim

We the jury find in favor of Plaintiff James Edward Brogdon, Jr., as Executor of the Estate of Debra Mills, and award damages against Ford Motor Company as follows:

Funeral Expenses: 12,352.80

Conscious Pain and Suffering: 500,000.00

OR

\_\_\_\_\_ We the jury find in favor of Ford Motor Company.

*Go to next section I-B.*

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B. Debra Mills Wrongful Death Claim



We the jury find in favor of Plaintiffs James Edward Brogdon, Jr. and Ronald Brian Brogdon, individually and as the surviving children of Debra Mills, and award damages against Ford Motor Company as follows:

Full Value of Debra Mills's Life: 15 million dollars

OR



We the jury find in favor of Ford Motor Company

*Go to next section II.*

II. CLAIMS ON BEHALF OF HERMAN MILLS

A. Herman Mills Estate Claim



We the jury find in favor of Plaintiff James Edward Brogdon, Jr., as Executor of the Estate of Herman Mills, and award damages against Ford Motor Company as follows:

Funeral Expenses: 12,599.90

Conscious Pain and Suffering: 5 million dollars

OR



We the jury find in favor of Ford Motor Company

*Go to next section II-B.*

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B. Herman Mills Wrongful Death Claim✓

We the jury find in favor of Plaintiff Jason Edwin Mills, individually and as the surviving child of Herman Mills, and award damages against Ford Motor Company as follows:

Full Value of Herman Mills's Life: 10 million dollars

OR

We the jury find in favor of Ford Motor Company.

*If you have awarded damages to any Plaintiff on any of Plaintiffs' claims, go to section III. If you did not award damages to any Plaintiff on any of Plaintiffs' claims, your deliberations are complete, and you should not answer any of the following questions. Your foreperson should sign and date the verdict form on the last page.*

## III. CONTRIBUTORY NEGLIGENCE AND ALLOCATION OF FAULT

Do you find by a preponderance of the evidence that any negligence on the part of Debra Mills contributed as a proximate cause to any of the damages that you have awarded to any of the Plaintiffs?

Answer Yes or No Yes

*If you answered NO, go to Section IV.*

*If you answered YES, assign fault as directed below.*

Assign the percentage of fault you find by a preponderance of the evidence for each person or entity whose conduct proximately caused injury to Debra Mills, Herman Mills, or both. Your total should add up to 100%.

Ford Motor Company: 85 %

Debra Mills: 15 %

TOTAL: 100 %

*Go to Section IV.*

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IV. PUNITIVE DAMAGES

Do you find that Plaintiffs proved by a clear and convincing evidence that punitive damages should be awarded against Ford Motor Company?

Answer Yes or No Yes

*Go to Section V.*

V. LITIGATION EXPENSES INCLUDING ATTORNEYS' FEES

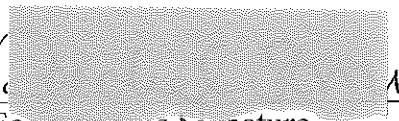
Do you find that Plaintiffs proved by a preponderance of the evidence that they are entitled to recover litigation expenses, including attorney's fees, from Ford Motor Company?

Answer Yes or No Yes

*Have your foreperson sign and date the verdict form.*

SO SAY WE ALL.

DATE: 2/13/2025

  
                          
Foreperson's Signature